

REMARKS

The claims remaining in the present application are Claims 13-22 and 24-38. Claims 1-12 and 23 have been canceled, without prejudice. Claims 13, 15, 22, 24-29 and 31-33 have been amended. Claims 35-38 have been added. The specification has been amended. No new matter has been added as a result of these amendments.

SPECIFICATION

The specification has been amended to provide an application number of a related application.

CLAIM REJECTIONS

35 U.S.C. §102

Claims 1-4 and 10-12 are rejected under 35 U.S.C. §102 as being anticipated by Sherer et al., U.S. Pat. No. 6,115,376 (hereinafter, Sherer). Claims 1-4 and 10-12 have been cancelled, without prejudice. Therefore, the rejection under 35 U.S.C. §102 is rendered moot.

Claims 31-34 are rejected under 35 U.S.C. §102 as being anticipated by Holloway et al., U.S. Pat. No. 5,905,859 (hereinafter, Holloway). The rejection is respectfully traversed for the following reasons.

Currently Amended Independent Claim 31 recites, in part:

a management agent that is able to:

compare addresses learned by said switches against said authorized addresses to determine an unauthorized address; and

trace a topology of said network to determine a port where a packet associated with said unauthorized address entered said network.

Applicants respectfully assert that Holloway fails to teach or suggest these claim limitations. Applicants respectfully assert that Holloway does not teach a system that traces a topology of a network to determine a port where a packet associated with said unauthorized address entered said network. In contrast, Holloway teaches that if the managed hub detects an unauthorized station connecting to the LAN, the hub disables the port and transmits a security breach detected frame (col. 3, lines 6-8). However, Holloway does not teach or suggest the claimed tracing of the topology to determine the port where a packet associated with said unauthorized address entered said network, as claimed.

For the foregoing reasons, Claim 31 is respectfully believed to be allowable over the Holloway.

Claims 32-34 are respectfully believed to be allowable at least by virtue of their dependency on Claim 31.

35 U.S.C. §103

Claims 5-9, 13-18 and 20-30 are rejected under 35 U.S.C. §103(a) as being unpatentable over Sherer in view of Burgess et al., U.S. Published Patent Application No. 2001/0012296 (hereinafter, Burgess). Claims 5-9 and 23 have been cancelled, without prejudice. Therefore, the rejection under 35 U.S.C. §103 to Claims 5-9 and 23 is rendered moot. The rejection to Claims 13-18, 20-21 and 24-30 is respectfully traversed for the following reasons.

Currently Amended Independent Claim 13 recites, in part:

tracing a topology of said network to determine a second port at which a packet associated with an unexpected address entered said network.

Applicants respectfully assert that Sherer fails to teach or suggest these recited limitations, while noting that the rejection concedes that Sherer is silent as to locating a second port in said network that is a source of an unexpected address if said unexpected address is detected.

The combination of Sherer and Burgess fails to teach these limitations because Burgess fails to remedy the deficiency in Sherer. The Applicants respectfully assert that Burgess' teaching of blocking a packet [0047] does not teach or suggest tracing a

topology of said network to determine a second port at which a packet associated with an unexpected address entered said network, as claimed. Burgess' teaching of blocking a packet determines that when neither a source or a destination address is stored in an address table, the packet is blocked because the transmission is between two devices of which neither has an allowed address.

Identifying a device as having a non-allowed address does not teach or suggest the claimed tracing a topology in that no tracing of topology is taught by Burgess method of identifying the devices (e.g., consulting a "special address" table as taught by Burgess is not tracing a topology, as claimed).

Moreover, Burgess teaching of identifying a device as having a non-allowed address does not teach or suggest the claimed determination of a second port at which a packet associated with an unexpected address entered said network in that identifying the source device and the destination device does not necessarily identify an entry point of the network, as claimed.

Claims 14-18 and 20-21 depend from Independent Claim 13, which is respectfully believed to be allowable. Therefore, Claims 14-18 and 20-21 are respectfully believed to be allowable.

Currently Amended Independent Claim 22 recites, in part:

tracing a topology of said network to find a third port where an unexpected address entered said network, said third port coupled to a device having a media access control (MAC address) that is said unexpected address.

Claim 22 recites limitations similar to those discussed in the response to Claim 13. For at least the reasons discussed in the response to Claim 13, Claim 22 is respectfully believed to be allowable.

Claims 24-30 depend from Independent Claim 22, which is respectfully believed to be allowable. Therefore, Claims 24-30 are respectfully believed to be allowable.

Claim 19 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sherer in view of Burgess and in further view of legal precedent related to reciting a plurality of elements (In re Harza 24 F.2d 669, 124 USPQ 378 (CCPA 1960)).

Claim 19 depends from Independent Claim 13, which as discussed herein is respectfully believed to be allowable over Sherer in view of Burgess. Applicants respectfully assert that Claim 13 is allowable over Sherer in view of Burgess and in further view of legal precedent related to reciting a plurality of elements.. Therefore, Claim 19 is respectfully believed to be allowable by virtue of its dependency on Claim 13.

NEW CLAIMS

Claims 35-38 have been added. Claims 35-38 are respectfully believed to be allowable at least by virtue of their dependence from Claim 31, which is believed to be allowable for reasons discussed herein.

CONCLUSION

In light of the above listed amendments and remarks, reconsideration of the rejected claims is requested. Based on the arguments and amendments presented above, it is respectfully submitted that Claims 13-22 and 24-8 overcome the rejections of record. Therefore, allowance of Claims 13-22 and 24-38 is respectfully solicited.

Should the Examiner have a question regarding the instant amendment and response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

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Respectfully submitted,  
WAGNER, MURABITO & HAO LLP  
W.C. Zarpis  
William A. Zarpis  
Registration No. 46,120

Address: WAGNER, MURABITO & HAO LLP  
Two North Market Street  
Third Floor  
San Jose, California 95113

Telephone: (408) 938-9060 Voice  
(408) 938-9069 Facsimile